

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI**

JENNIFER GOSCHE,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No.:
	)	
MICHAEL A. ADAMS,	)	
Serve at: 100 El Paso Street	)	
Holland, TX 76534	)	
	)	
and	)	
	)	
ML ADAMS TRUCKING, LLC,	)	
Serve at: Registered Agent	)	
Michael A. Adams	)	
104 Fannin Street	)	
Holland, TX 76534	)	
	)	
Defendants.	)	<b>JURY TRIAL DEMANDED</b>

**COMPLAINT**

COMES NOW Plaintiff, Jennifer Gosche, by and through counsel, Sauter Sullivan, LLC, and for her Cause of Action against Defendants, Michael A. Adams and ML Adams Trucking, LLC, states as follows:

1. Plaintiff, Jennifer Gosche, is an individual and resides in St. Louis County, State of Missouri and a citizen of the State of Missouri.
2. Defendant, Michael A. Adams, is an individual and resides in Texas and is a citizen of the State of Texas.
3. Defendant, ML Adams Trucking, LLC, is a Texas Corporation and is a citizen of the State of Texas.

4. Jurisdiction is proper in this Court based upon Diversity Jurisdiction pursuant to §28 U.S.C §1332, as Plaintiff is a citizen of Missouri, Defendants are citizens of Texas and as the amount in controversy exceeds \$75,000.00.

5. The collision which gave rise to this action occurred in St. Louis County, Missouri.

6. On June 17, 2019, Plaintiff was injured in an automobile/truck collision which occurred on Interstate 270 in St. Louis County, Missouri.

7. On June 17, 2019, Defendant Michael A. Adams was operating a tractor-trailer owned by ML Adams Trucking, LLC and was acting in the course and scope of his employment with ML Adams Trucking, LLC.

8. While operating the tractor-trailer on Interstate 270, Defendant Adams suddenly and without warning attempted to change lanes and drove his tractor-trailer in to the traffic lane occupied by Plaintiff, thereby striking Plaintiff's vehicle causing her to spin and then striking her again.

9. At the time of the incident, Defendant Adams was negligent and careless in causing the collision in one or more of the following respects:

- a. He failed to keep his truck in the proper lane.
- b. He failed to keep a careful lookout.
- c. He operated his truck too fast for the conditions then and there existing.
- d. He failed to yield to the right of way of Plaintiff's vehicle.
- e. He failed to maintain control of his truck.
- f. He failed to signal a lane change.

- g. He made an improper lane change when it was not safe to do so.
- h. He failed to swerve or take other evasive action to avoid coming into contact with Plaintiff's vehicle.

10. Defendant ML Adams Trucking, LLC is responsible for the negligent conduct of its agent/employee and driver, Defendant Michael A. Adams, pursuant to respondent superior.

11. As a direct and proximate result of the conduct of Defendants, Plaintiff has sustained and will continue to sustain serious and permanent injuries to her neck and back.

12. As a direct and proximate result of the conduct of Defendants, Plaintiff has sustained and will continue to sustain mental and emotional injuries including but not limited to PTSD.

13. As a direct and proximate result of the injuries set forth above, Plaintiff has endured pain and suffering, has been compelled to submit to treatment by hospitals, physicians, nurses, therapists and other healthcare providers and has incurred medical expenses and shall incur further medical expenses in the future because of such injuries.

14. As a direct and proximate result of the injuries set forth above, Plaintiff has endured pain and suffering and permanent disability and will have ongoing pain and suffering in the future.

15. As a direct and proximate result of the injuries set forth above, Plaintiff has sustained a loss of income and will incur additional lost income in the future.

16. Defendants are jointly and severally liable for Plaintiff's injuries and damages.

WHEREFORE, Plaintiff, Jennifer Gosche, respectfully requests judgment against Defendants Michael A. Adams and ML Adams Trucking, LLC, jointly and severally, in an

amount to be fully determined at trial in excess of \$75,000.00, for an award of costs and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

**SAUTER SULLIVAN, LLC**

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